

1 District Judge Jamal N. Whitehead
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AISHWARYA RAGHAVAN and
AVININDRA PARUCHURI,

Plaintiffs,

v.

UR M. JADDOU, *et al.*,

Defendant.

No. 2:23-cv-517-JNW

STIPULATED MOTION TO EXTEND
DEADLINES AND [PROPOSED]
ORDER

Noted for Consideration:
November 7, 2023

15 Plaintiffs Ashwarya Raghavan and Avinindra Parchuri and Defendants through their
16 respective counsel, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 10(g) and 16, and
17 hereby jointly stipulate and move for a one-week extension of the deadline for Defendants to respond
18 to the Amended Complaint.

19 Plaintiffs filed an Amended Complaint on October 13, 2023, Dkt. No. 17, which added Antony
20 Blinken, the Secretary of the State, as a Defendant. The Amended Complaint asserts, *inter alia*, that
21 Defendants have unlawfully withheld and/or delayed the issuance of a final determination and the
22 issuance of an immigrant visa number concerning their Form I-485s due to retrogression.

1 Defendants' current deadline to respond to the Amended Complaint is November 10, 2023. For
2 good cause, the parties request that the Court extend this deadline until November 17, 2023.

3 A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and
4 trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910,
5 912 (9th Cir. 1986).

6 Initially, the parties agreed that Defendants would respond to the Amended Complaint by
7 November 10, 2023. Dkt. No. 16, Joint Status Report. However, Defendants' counsel inadvertently
8 proposed this deadline without realizing that it fell on a federal holiday. Defendants seek this short
9 extension to ensure that counsel can fully communicate with necessary agency personnel before
10 filing a response. Furthermore, the additional week will allow Plaintiffs to execute service on
11 Antony Blinken.

12 Accordingly, the parties request that the Court extend Defendants' deadline to respond to the
13 Amended Complaint until November 17, 2023.

14 Dated: November 7, 2023

Respectfully submitted,

15 TESSA M. GORMAN
16 Acting United States Attorney

17 *s/Michelle R. Lambert*
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21 I certify that this memorandum contains 264 words,
22 in compliance with the Local Civil Rules.

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Attorneys for Plaintiffs

1 **[PROPOSED] ORDER**
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Defendants' time to respond to the Complaint is extended to November 17, 2023. It is so
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ORDERED.
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4 DATED this 9th day of November, 2023.
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7 Jamal N. Whitehead
8 United States District Judge
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